

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES LLC, )  
Plaintiff and Counterclaim Defendant, )  
v. ) 04 Civ. 02496 (CM)(LMS)  
OBERTHUR CARD SYSTEMS, S.A., )  
Defendant and Counterclaim Plaintiff. )  
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**DECLARATION OF NEIL G. COHEN IN SUPPORT OF  
PLAINTIFF'S BRIEF IN SUPPORT OF ITS CLAIM CONSTRUCTION**

**DECLARATION OF NEIL G. COHEN**

I, Neil G. Cohen, declare as follows:

1. I am an attorney admitted to practice before this Court in the above-referenced litigation. I have personal knowledge of the following, and if called to testify under oath in these proceedings, I would competently testify thereto.
2. Attached as Exhibit A is a true and correct copy of United States Patent No. 5,817,207.
3. Attached as Exhibit B is a true and correct copy of United States Patent No. 6,036,099.
4. Attached as Exhibit C is a true and correct copy of United States Patent No. 6,214,155.
5. Attached as Exhibit D is a true and correct copy of United States Patent No. 6,514,367.
6. Attached as Exhibit E is a true and correct copy of United States Patent No. 4,450,024.
7. Attached as Exhibit F is a true and correct copy of United States Patent No. 5,519,201.
8. Attached as Exhibit G is a true and correct copy of the prosecution history of United States Patent No. 5,817,207 (excluding copies of references cited therein).
9. Attached as Exhibit H is a true and correct copy of the prosecution history of United States Patent No. 6,214,155 (excluding copies of references cited therein).
10. Attached as Exhibit I is a true and correct copy of the prosecution history of United States Patent No. 6,036,099 (excluding copies of references cited therein).
11. Attached as Exhibit J is a true and correct copy of the prosecution history of United States Patent No. 6,514,367 (including copies of references cited therein).
12. Attached as Exhibit K is a true and correct copy of the “Definitive List Of Claims To Be Construed By The Court” (filed October 15, 2004).
13. Attached as Exhibit L is a true and correct copy of “Claim Tables” compiled from the website of the United States Patent And Trademark Office ([www.uspto.gov](http://www.uspto.gov)).

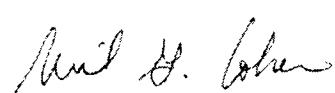
14. Attached as Exhibit M is a true and correct copy of excerpts from *Dictionary of Scientific and Technical Terms* (Sybil P. Parker ed., McGraw Hill 5<sup>th</sup> ed 1994).

15. Attached as Exhibit N is a true and correct copy of excerpts from *Electronic Packaging, Microelectronics, and Interconnection Dictionary* p. 26 (Harper et al., McGraw-Hill, Inc. 1993).

16. Attached as Exhibit O is a true and correct copy of excerpts from *Webster's Collegiate Dictionary, 10<sup>th</sup> Ed.*, © 1999; principal © 1993.

17. Attached as Exhibit P is a true and correct copy of excerpts from *Dictionary of Composite Materials* (Stuart Lee ed., Technomic Publishing Co., Inc. 1989).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5<sup>th</sup> day of November 2004, at Suffern, New York



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Neil G. Cohen